

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MARYLAND

UNITED STATES OF AMERICA,)
)
Plaintiff,)
vs.)
) CRIMINAL NO.:
MAHMOOD HUSSAIN SHAH,) 1:16-cr-00430-MJG
)
Defendant.)

EXCERPT

EXCERPT OF JURY TRIAL
(Testimony of Mohammad Fayzanali)

BEFORE THE HONORABLE MARVIN J. GARBIS
February 14, 2018
Baltimore, Maryland

For the Plaintiff:

Sean R. Delaney, Esquire
Paul E. Budlow, Esquire
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For the Defendant:

Leonard H. Bennett, Esquire
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Proceedings recorded by mechanical stenography,
transcript produced by computer.

Patricia G. Mitchell, RMR, CRR
Federal Official Court Reporter
101 W. Lombard Street, 4th Floor
Baltimore, Maryland 21201

P R O C E E D I N G S

MR. DELANEY: Court's indulgence one moment. The government calls Mohammad Fayzanali.

THE CLERK: Sir, you can come forward to the witness stand, please. Stand up and raise your right hand for me.

MOHAMMAD FAYZANALI, GOVERNMENT'S WITNESS, SWORN

THE CLERK: Thank you, you can have a seat. Speak directly into that microphone. State and spell your first and last name for the record.

THE WITNESS: First name is Mohammad,
M-o-h-a-m-m-a-d, last name Fayzanali, F-a-y-z-a-n-a-l-i.

THE CLERK: Thank you.

MR. BUDLOW: Your Honor, before we begin with this witness, may I have a second with Mr. Bennett.

(Counsel confer.)

MR. BUDLOW: Your Honor, we need to approach.

THE COURT: All right.

(Bench conference on the record:

THE COURT: What is it?

MR. BUDLOW: Your Honor, two witnesses ago the government called Special Agent Charmeka Parker. She's been done testifying; the government is not planning on recalling her. Mr. Bennett informed me he is not planning on recalling her. I was going to ask -- she wanted to know if she could come back in the courtroom. I think there's no reason not to

1 let her in here. Mr. Bennett said he objected to that so
2 that's why I want to approach --

3 THE COURT: I don't see any objection for it.

4 MR. BENNETT: I do, Your Honor. I think that her
5 presence may compel -- may force the witness to enter a line
6 of testimony he may not otherwise say. I think if the
7 witnesses are sequestered, there's no need to do a favor --

8 THE COURT: -- I don't think she's had any contact
9 with this witness.

10 MR. BENNETT: I may end up calling her back, Your
11 Honor. I'm not saying I won't for good. I don't know what's
12 going to happen in the future; I may call her. Why should I
13 give up something for a favor --

14 THE COURT: Why would you call her back?

15 MR. BENNETT: I don't know what's going to be said,
16 Your Honor.

17 THE COURT: I think you're playing games here.
18 That's not right.

19 MR. BENNETT: What benefit is this? She just wants
20 to -- the spectacle of it?

21 THE COURT: The witness would like to see a public
22 trial; this is a public courtroom. I don't see any prejudice
23 to the defendant. She'll sit quietly in the background.

24 MR. BENNETT: But Your Honor, this witness is
25 intimately involved in this case --

1 THE COURT: There's no allegation that there's any
2 bad function of her being here, so she's allowed to be here.
3 You can't call her back, that's all --

4 MR. BENNETT: I cannot call her back --

5 THE COURT: You and the government can't call her
6 back.

7 MR. BENNETT: Okay, can we put that on the record
8 then that --

9 THE COURT: I just put it on the record.

10 MR. BENNETT: -- I cannot call her back over my
11 objection.

12 MR. BUDLOW: -- saying something different from the
13 Court --

14 THE COURT: Over your objection that she's allowed
15 to come in the courtroom and observe --

16 MR. BENNETT: Exactly.

17 THE COURT: -- but she's not being called back as a
18 witness.

19 MR. BENNETT: Thank you --

20 MR. BUDLOW: I'd like to clarify one thing, Your
21 Honor. Your Honor said that because she's coming back in the
22 courtroom, the government, as they've indicated, isn't calling
23 her back and cannot call her back. Mr. Bennett repeated it
24 back to you but changed it to say that the Court had just
25 ordered that he may not call the witness back --

1 THE COURT: -- will not be able to call her back,
2 but right now she can come to the courtroom. There's nothing
3 she's going to see that will relate to her testimony.

4 MR. BENNETT: Please note my objection. That's all
5 I want.

6 THE COURT: All right.

7 MR. BENNETT: Thank you.)

8 **(Bench conference concluded.)**

9 **DIRECT EXAMINATION**

10 **BY MR. DELANEY:**

11 Q Good afternoon, sir. Can you tell us your name?

12 A Mohammad --

13 MR. BENNETT: I thought the Court was going to put
14 something on the record first.

15 MR. BUDLOW: We just did --

16 MR. DELANEY: We just did.

17 MR. BENNETT: Very good.

18 THE CLERK: Speak directly to the microphone and
19 clearly. Your elbow is rubbing on the mic. The court
20 reporter needs to get a clear record, thank you.

21 MR. BENNETT: Before we begin, can we move the
22 screen? You're not showing anything.

23 MR. DELANEY: Yeah. Paul, why don't you get it.

24 BY MR. DELANEY:

25 Q Sir, can you tell us your name?

1 A Mohammad.

2 Q Last name?

3 A Fayzanali.

4 Q How old are you, sir?

5 A Twenty-six.

6 Q Where were you born?

7 A Pakistan.

8 Q How old were you when you came to this country?

9 A Six.

10 Q You're a citizen, right?

11 A Yes.

12 Q Do you have any brothers or sisters?

13 A Yes.

14 Q How old are they?

15 A One is 20, other one is 23, and the third one is

16 24.

17 Q Can you tell us your parents' names?

18 A Muhammad Rafiq and Shazia Gul.

19 Q Your father is Muhammad Rafiq and your mother is

20 Shazia Gul?

21 A Yes.

22 Q Where did you go to school?

23 A Franklin High School.

24 Q Did you graduate?

25 A Yes.

1 Q What do you do for a living?

2 A Pharmacy tech.

3 Q Where do you work as a pharmacy tech?

4 A Towson Pharmacy.

5 Q Are you ultimately -- would you like to become a
6 pharmacist one day?

7 A Yes.

8 Q Do you work other jobs as well?

9 A On the weekends I, like, do delivery for medications
10 and stuff.

11 Q Okay. Do you also work at Corner Grocery?

12 A I help out sometimes.

13 Q At this point in time now, does Corner Grocery
14 accept food stamps?

15 A No.

16 Q Just get this out of the way. You're here pursuant
17 to a subpoena; is that right?

18 A Yes.

19 Q You would rather not testify today?

20 A Correct.

21 Q This is not your choice, you do not want to be here;
22 is that right?

23 A Correct.

24 Q I'm also going to just ask this right off the bat.
25 To your knowledge, do you know if individuals at Corner

1 Grocery have ever exchanged food stamps for cash?

2 A Yes.

3 Q Have you personally exchanged food stamps for cash
4 at Corner Grocery?

5 A Yes.

6 Q Have you told that to the government?

7 A Yes.

8 Q Has the government told you that you will not be
9 prosecuted for having exchanged food stamps for cash while
10 working at Corner Grocery?

11 A Yes.

12 Q Was Corner Grocery store the first convenience store
13 you ever worked at?

14 A No.

15 Q What was the first store you worked at?

16 A It was my dad's store. It was called 512 located in
17 Annapolis, Maryland.

18 Q Okay. Did your dad own another store?

19 A Yes, it was a Citgo gas station.

20 Q Where was the Citgo located vis-a-vis Corner
21 Grocery?

22 A Around the block.

23 Q It was like right around the block from Corner
24 Grocery?

25 A Yes.

1 Q When you worked at the Citgo, did the store accept
2 food stamp benefits?

3 A Yes.

4 Q When you worked at the Citgo, did you ever exchange
5 food stamps for cash?

6 A No.

7 Q To your knowledge, when your father owned the Citgo,
8 had he ever exchanged food stamps for cash?

9 A No.

10 Q What ultimately happened to that Citgo?

11 A My dad went bankrupt.

12 Q He went bankrupt and the store had to close?

13 A Correct.

14 Q After the Citgo closed, where did your father go to
15 work?

16 A Corner Grocery.

17 Q And who owned Corner Grocery at that time?

18 A Mr. Shah.

19 Q Did Mr. Shah have any other partners at that time?

20 A I believe he did.

21 Q And is that Mohammad Khan?

22 A I don't know.

23 Q What happened to Mr. Shah's partner, to your
24 knowledge?

25 A I have no idea.

1 Q Did your father ultimately become Mr. Shah's
2 partner?

3 A Yes.

4 Q When your father joined Corner Grocery, was his half
5 of the business placed in his own name?

6 A I don't think so; not in the beginning, no.

7 Q Not in the beginning? Was that because he'd just
8 gone through bankruptcy?

9 A Correct.

10 Q In whose name was the half of the business placed?

11 A My mom's.

12 Q What about the bank account? Was the bank account
13 placed in your father's name?

14 A No.

15 Q I'm going to put up Government's Exhibit 7. I'm
16 going to clip to page 3, blow up the center of the page.

17 Can you see what's on the screen, sir? I can pull
18 it back up so you can see it. Let me help you out.

19 A Yes.

20 Q If you have difficulty seeing, I'm sure the judge
21 would allow Mr. Bennett to move if he has any trouble seeing
22 the witness.

23 Do you recognize your name?

24 A Yes.

25 Q Let's go back to the top of that page. Do you see

1 the account number there that the cursor is pointing to; the
2 last four digits? Can you tell us what those four digits
3 are?

4 A I believe that they're the account number.

5 Q Tell us what are the four numbers there; are they
6 4799?

7 A 4799, yes.

8 Q And the account title is?

9 A ShahKhan, Incorporated.

10 Q Were you on the bank account for ShahKhan,
11 Incorporated?

12 A Yes.

13 Q Okay. Was this the only bank account for the store
14 that you were aware of?

15 A Yes.

16 Q Did you use the bank account?

17 A Yes.

18 Q Did Mr. Shah use the bank account?

19 A Yes.

20 Q Did Mr. Rafiq -- did your father use the bank
21 account?

22 A Yes.

23 Q How many cards were there associated with that bank
24 account?

25 A Two.

1 Q Was one of those cards in your name?

2 A Yes.

3 Q Was one of those cards in Mr. Shah's name?

4 A Yes.

5 Q Were there any cards in your father's name?

6 A No.

7 Q I guess this is a dumb question, but did you use the
8 card in your own name?

9 A Not personally, no, but I have used --

10 Q You have used the card in your own name?

11 A Yes.

12 Q Has your father also used the card in your name?

13 A Yes.

14 Q Which card did Mr. Shah use?

15 A His own.

16 Q To your knowledge, did anybody else use Mr. Shah's
17 card?

18 A No.

19 Q When you did transactions with the bank, what type
20 of transactions did you do?

21 A Like just withdraw money.

22 Q Okay. Would you do that -- was it your decision or
23 were you asked to withdraw money?

24 A My dad would tell me to withdraw money.

25 Q And when you withdrew money, did you do it at an ATM

1 or go into the bank?

2 A Inside the bank.

3 Q When your father would withdraw money, was it at an
4 ATM or was it inside the bank?

5 A ATM.

6 Q Why would you be the one to go into the bank?

7 A Because the card had limit of 500 and you can't
8 really take out more than that.

9 Q The ATM had a \$500 limit so if you needed more cash,
10 somebody had to go into the store [sic]?

11 A Yes.

12 Q Let's talk about the store itself, Corner Grocery.
13 What types of items did you have at the store?

14 A Grocery things like milk, cereal, eggs, chips,
15 candy, soda.

16 Q How much does, like, a gallon of milk cost?

17 A Like \$5.

18 Q Like a loaf of -- you said \$5?

19 A Yes.

20 Q Like a loaf of bread; how much does that cost?

21 A 1.50.

22 Q The average customer who comes in to buy food, how
23 much do they spend to buy groceries?

24 A About \$10 or more.

25 Q \$10 or more. What's the -- like if -- we're coming

1 up in range. An average customer, they walk in, spend \$10 or
2 more, how much more?

3 A Like 10 to 20.

4 Q 10 to 20?

5 A Yes.

6 Q What's the most you've ever seen somebody buy in
7 food when you were working at Corner Grocery?

8 A Around \$50.

9 Q Around \$50. Okay. Where did Corner Grocery get its
10 supplies from?

11 A Different vendors like Sam's Club and B. Green's and
12 other, like, distributors.

13 Q Sam's, B. Green's, and --

14 A Like Pepsi, Coke, and Canada Dry.

15 Q What were, like, the two -- what was the biggest
16 vendor, and what would you say is the second biggest vendor?

17 A I'd say the biggest vendor would be Sam's Club.

18 Q And the second biggest vendor?

19 A B. Green's.

20 Q Were there any other vendors as big as Sam's or B.
21 Green's that you can remember?

22 A Yes; Pepsi and Canada Dry.

23 Q Any other vendors you can remember?

24 A No.

25 Q Did you buy stuff at, like, Walmart or Target?

1 A Yeah, sometimes.

2 Q Sometimes? Was it anything like Sam's Club or B.
3 Green, did you spend anything close to as much those other
4 stores as you did at Sam's Club and B. Green?

5 A No; we'll buy cheap stuff.

6 Q Did you buy stuff in cash or with the card?

7 A Cash.

8 Q Did you also buy stuff with the card?

9 A Yes, through Sam's Club.

10 Q Okay. When you shopped at Sam's Club or B. Green,
11 do you need like an account in order to shop there?

12 A Yes.

13 Q Did you have a store account or did you guys use
14 your own account?

15 A It's the store's account.

16 Q It's the store account. So if you were shopping for
17 the store, did you use the store's account?

18 A Yes.

19 Q Did you guys accept food stamps at Corner Grocery?

20 A Yes.

21 Q Did you also accept -- did you do TANF
22 transactions?

23 A What do you mean?

24 Q Do you know what a TANF, T-A-N-F, transaction is?

25 A No.

1 Q Do you know what a cash-back transaction is?

2 A Yes.

3 Q Is it possible for some people to get cash back, a
4 separate transaction, from their food stamps?

5 A Yes.

6 Q How does that work? If you're doing a different
7 transaction, how does it work?

8 A They'll just come in and tell you how much they need
9 and basically charge them a fee, like a transaction fee, which
10 is like two dollars.

11 Q Like a two-dollar transaction fee? And when you
12 were using -- would you use the same, like, machine to do
13 that?

14 A Yes, it was only one.

15 Q All in one. Would you have different selections
16 that you would make?

17 A Yes.

18 Q And that was a separate transaction.

19 A Correct.

20 Q Is that something you got confused or you know
21 there's a difference between the two?

22 A I know the difference.

23 Q What shifts did your father work at Corner
24 Grocery?

25 A The mornings.

1 Q What shift did Mr. Shah work?

2 A Afternoons.

3 Q On the days when you worked, when would you work?

4 When you did work, when would you work?

5 A It was after school, after 5:00.

6 Q And on the days -- would you be covering somebody

7 else's shift on those days?

8 A Yes.

9 Q Safe to say you didn't have a regular shift of your
10 own.

11 A No.

12 Q You'd be covering a shift for --

13 A Sometimes.

14 Q If it was a late afternoon or evening shift, who
15 would you be covering for?

16 A Mr. Shah.

17 Q I guess if you were covering a morning shift, who
18 would you be covering for?

19 A My dad.

20 Q On the days when you worked at the store, would
21 customers come in looking for your father or for Mr. Shah?

22 A Yes.

23 Q If customers asked you for your father or Mr. Shah,
24 did they ever leave when they found out it was you there
25 working?

1 A Yes.

2 Q Did customers ask you if you would exchange food
3 stamps for cash?

4 A Yeah, they tried to ask me.

5 Q When you first started at Corner Grocery, had you
6 ever given somebody cash in exchange for food stamp
7 benefits?

8 A Not in the beginning, no.

9 Q At first, did you actually tell people no?

10 A Yes.

11 Q What types of things would customers say to you when
12 you told them no?

13 A Like "Where's your father at?" Stuff like that.

14 Q Did they ask you where your father was?

15 A Yes.

16 Q Did they ever ask you where Mr. Shah was?

17 A Yes.

18 Q Would they ever tell you that your father and
19 Mr. Shah would do this transaction?

20 A Yes.

21 Q Eventually did you yourself exchange food stamps for
22 cash?

23 A Yes.

24 Q How did you learn how to do it?

25 A I told a customer no, and he pretty much, like,

1 directed me and showed me how to do it.

2 Q Okay. Tell us how you do it.

3 A So he was, like, "You just got to charge \$40, and
4 you keep 20 and then you give me 20."

5 Q Okay. The first time you did it, the customer
6 actually told you that you could keep 20?

7 A Yes.

8 Q And the first time you did it, what did you do with
9 the 20?

10 A Kept it.

11 Q When you said you kept it, did you keep it for
12 yourself or did you put it in the --

13 A I put it in my pocket.

14 Q You put it in your pocket. Then did you do it a few
15 times at first where you kept the money for yourself?

16 A No, just that one time.

17 Q Did you tell your father?

18 A Yes.

19 Q What happened?

20 A He got mad, and banned me from going to the store.

21 Q Was he mad because you did the transaction or mad
22 because you kept the money?

23 A He was mad because of the transaction.

24 Q Did Mr. Shah learn that you kept the money that
25 time?

1 A I don't know.

2 Q After the first time when you kept the money, at
3 some point in time later, did you end up going back to the
4 store to work?

5 A Yeah, like months later, yes.

6 Q And at some point in time after you went back to the
7 store, did you again exchange food stamps for cash?

8 A Yes.

9 Q This time when you did it, what happened to the
10 money that was not the cash that went out to the customer?

11 A It went in the drawer.

12 Q It stayed in the drawer?

13 A (Witness nods head.)

14 Q Let's talk it through. If somebody comes in and
15 they ask to exchange food stamps for cash and they want \$20
16 back, you would give them \$20 from where?

17 A From the register.

18 Q And then you would run their card and how much would
19 you run that card for?

20 A 40.

21 Q 40. So would you then take 20 out of the register
22 for yourself?

23 A No, I'd just leave it in there.

24 Q Just left it in the account for the store.

25 A Yes.

1 Q What was the most -- and to your knowledge, did
2 others at Corner Grocery exchange food stamps for cash as
3 well?

4 A No. I don't think so.

5 Q You don't think that anyone else exchanged food
6 stamps for cash at Corner Grocery?

7 A Other than my uncle -- I mean other than Mr. Shah
8 and my dad, no.

9 Q Sorry, I was improper with my question.

10 So Mr. Shah and Mr. -- Mr. Shah and your father
11 exchanged food stamps for cash at Corner Grocery to your
12 knowledge?

13 A Yes.

14 Q What was the most that Corner Grocery would exchange
15 in food stamps for cash?

16 A To my knowledge, like 60.

17 Q Why not more?

18 A Because the store was, like, too small to be -- I
19 don't know.

20 Q Do you remember having a conversation with Mr. Shah
21 about why the transactions weren't higher?

22 A No. My dad pretty much told me why.

23 Q What did your dad tell you?

24 A It was a raid that happened from there.

25 Q Okay. Let's go back to that. You said a raid

1 occurred. Was that the raid of Corner Grocery?

2 A No, it was stores around there.

3 Q And how did you learn about this raid?

4 A My dad came home and he was -- he pretty much let it
5 out.

6 Q What did he let out?

7 A That he wants to stop it, and people around us are
8 getting caught doing it.

9 Q So the raid was of other stores for selling food
10 stamps for cash.

11 A Yes.

12 Q And your father was upset about this.

13 A Yes.

14 Q And he told you that he wanted to stop it?

15 A Yeah, he was scared.

16 Q After the raid, what, if anything, changed about the
17 way Corner Grocery conducted food stamp transactions?

18 A Would deny a lot of people.

19 Q I'm sorry, what was that?

20 A We would deny a lot of people from using it.

21 Q You denied a lot of people, so you would say no to
22 people who asked?

23 A Yes.

24 Q What about the amounts of food-stamp-for-cash
25 transactions after the raid?

1 A It would be lower.

2 Q Okay. Yours would be lower?

3 A In general they'd be lower. Like the transaction
4 would be lower.

5 Q The amount of food stamps exchanged for cash would
6 be lower.

7 A Correct.

8 Q Yours would, right?

9 A Yes.

10 Q Would your father's?

11 A I guess, yes.

12 Q Mr. Shah's?

13 A Yes.

14 Q After the raid, did you ever observe Mr. Shah
15 recording anything with respect to food stamp transactions?

16 A There was a list. On that list they would show who
17 used it.

18 Q When you say "who," do you mean the person's name or
19 the card number?

20 A The card number.

21 Q On what was it written?

22 A The number of the card, the card numbers.

23 Q And who would write down the number of the card?

24 A I wouldn't know.

25 Q Was there a particular time you came into the store

1 and observed anyone writing on that document?

2 A Yes.

3 Q Who was it?

4 A Mr. Shah.

5 Q What happened when you saw this document -- I'm
6 sorry, what was it written on?

7 A On a piece of paper.

8 Q Okay. And what happened when you saw this piece of
9 paper?

10 A It was, like, I'm not sure -- it was ripped. He
11 would rip it.

12 Q He would rip it?

13 A Yeah.

14 Q Was there ever a time you saw him consult this list
15 while speaking to a customer?

16 A Yes.

17 Q What happened?

18 A It was already used.

19 Q I'm sorry, I couldn't hear.

20 A The card was already used.

21 Q Well, was that said?

22 A Yes.

23 Q Who said it?

24 A Mr. Shah.

25 Q Why did he say it?

1 MR. BENNETT: Objection.

2 THE COURT: He can say what he said or did he
3 explain why he did it.

4 BY MR. DELANEY:

5 Q Did somebody say the card had been used before?

6 A Yes.

7 Q Who said that?

8 A Mr. Shah.

9 Q And who was he saying it to?

10 A A customer.

11 Q Based on the conversation, do you understand why he
12 was telling the customer that?

13 A I guess he was trying to use it again.

14 Q Who was trying to use the card again?

15 A The customer.

16 Q To exchange food stamps for cash?

17 A Yes.

18 MR. DELANEY: Court's indulgence one moment.

19 (Pause.)

20 MR. DELANEY: Just a couple more questions.

21 BY MR. DELANEY:

22 Q Corner Grocery store was in a -- we'll say a rough
23 neighborhood; is that right?

24 A It was a very rough neighborhood.

25 Q At some point in time, were you actually robbed when

1 you were working at Corner Grocery store?

2 A Yes.

3 Q This wasn't exactly a comfortable environment to
4 work in.

5 A Correct.

6 Q And oftentimes you worked at night, right?

7 A Yes.

8 Q The transaction amounts at Corner Grocery, you said
9 they were kept low. Do you remember having a conversation
10 with Mr. Shah about why the transactions were kept low?

11 A The day that I came home --

12 MR. BENNETT: Objection, Your Honor, if he's
13 testifying as to Mr. Shah's state of mind.

14 THE COURT: The question is why were the
15 transactions kept low. He can give his understanding of why
16 it is. What was in his mind.

17 BY MR. DELANEY:

18 Q What did he tell you as to why the transactions were
19 kept low?

20 THE COURT: What's the "he?" Who told?

21 BY MR. DELANEY:

22 Q What, if anything, did Mr. Shah tell you about why
23 the transactions were kept low?

24 MR. BENNETT: That's what I'm objecting to.

25 THE COURT: That's not objectionable.

1 You can answer that.

2 A Because the raid that happened, the figure that the
3 store was too -- was incapable of doing as much.

4 BY MR. DELANEY:

5 Q Higher transactions would be suspicious?

6 A Yes.

7 Q There was bulletproof glass at Corner Grocery;
8 correct?

9 A Yes.

10 Q And there was a door to the room where the cashier
11 was?

12 A Yes.

13 Q Could you close that door?

14 A Yes.

15 Q Could you lock that door?

16 A Yes.

17 Q Did the lock always work?

18 A Not always, but sometimes.

19 Q Okay. And you could close the door; there was
20 nothing that was preventing you from closing the door?

21 A No, but it was -- it wasn't secure.

22 Q Okay.

23 MR. DELANEY: Nothing further at this time.

24 THE COURT: All right. Mr. Bennett.

25 **CROSS-EXAMINATION**

1 **BY MR. BENNETT:**

2 Q Mr. Fayzanali --

3 A Yes.

4 Q Whatever became of Corner Groceries?

5 A Since the -- I'm sorry, I don't get the question.

6 Q What's the state of the store now? What's happened
7 with the store now?

8 A It's pretty much gone out of business.

9 Q Okay. You said "pretty much."

10 A Yes.

11 Q Is there anybody still working there?

12 A Like, my brother will go there; my mom sometimes.

13 Q Okay. Okay. Since the raid, though, Mr. Shah has
14 not been there; is that correct?

15 A No, he's not been there.

16 Q Neither your father?

17 A No.

18 Q Have you been pretty much running the store?

19 A Yes. I mean we're there. And my mom sometimes.

20 Q Okay, okay. You said it's a very dangerous
21 neighborhood, and you said that you had been threatened
22 yourself before at the store?

23 A Yeah.

24 Q Do you know of any threats that Mr. Shah received?

25 A Yes, a lot.

1 Q Okay, okay. And why would he receive threats?

2 A He wouldn't do what the customers told him
3 sometimes, and somebody keyed his car, and they would break
4 the window a couple of times, and they broke his tires.

5 Q Okay. Okay. All right. You did deposits for the
6 store quite a bit, didn't you?

7 A Yeah --

8 Q Deposits? Did you do deposits?

9 A Yes.

10 Q Did you also assist with the purchases?

11 A Sometimes I would go to, like, Sam's Club to
12 purchase things.

13 Q Okay, okay. All right.

14 MR. BENNETT: I have nothing further.

15 THE COURT: Ok, fine.

16 Mr. Delaney?

17 MR. DELANEY: Nothing.

18 THE COURT: All right. The witness is excused. You
19 can leave.

20 MR. BENNETT: Thank you.

21 (The witness was excused).

22 (End of excerpt.)

23 *****

24 I, Patricia G. Mitchell, RMR, CRR, do hereby certify
25 that the foregoing is a correct transcript from the

1 stenographic record of February 14, 2018 proceedings in the
2 above-entitled matter.

3 Dated this 29th day of October 2018.

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6 _____
7 Patricia G. Mitchell
8 Official Court Reporter
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